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December 2, 2022

VIA ECF

The Honorable John G. Koeltl
United States District Court
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007

*The search condition is a
condition of Probation
is struck - so ordered.
JGK
U.S.D. 2*

Re: United States v. Gregory Dwyer, No. 1:20-cr-500 (JGK)

Dear Judge Koeltl:

We represent Greg Dwyer in the above-referenced matter. We write pursuant to 18 U.S.C. § 3563(c) to request modification of Mr. Dwyer's conditions of probation. Specifically, we respectfully request that the Court strike the search condition imposed on Mr. Dwyer. *See Judgment, ECF No. 422 at 2.*

As the Court may recall, at sentencing, counsel for Mr. Dwyer requested that the search condition not be imposed on Mr. Dwyer. Dwyer Sentencing Tr. at 12. The Court inquired as to whether the condition had been struck in the conditions of probation ordered for Messrs. Hayes, Delo, and Reed. *Id.* The government informed the Court that the government and defense would confer and write to the Court noting whether the condition had in fact been imposed on Messrs. Hayes, Delo, and Reed. *Id.* at 13. The Court ultimately imposed the condition but also noted that it could change the condition if it was the case that the Court had previously struck the condition.

After conferring with the government, counsel for Mr. Dwyer can confirm that the search condition was not imposed on Messrs. Hayes, Delo, or Reed. *See, e.g.,* Reed Sentencing Tr. at 24-25, ECF No. 396 ("The Court will also not impose the special condition suggested by the probation department at pages 45 and 46 of the presentence report. There is no need for a search condition.").

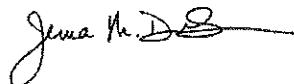
Accordingly, we respectfully request that Mr. Dwyer's conditions of probation be modified to strike the search condition. The government consents to the requested modification.

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We appreciate the Court's consideration.

Respectfully submitted,



Jenna M. Dabbs
Counsel for Gregory Dwyer

cc: Assistant United States Attorneys Samuel Raymond, Jessica Greenwood, and Nathan Rehn